

# Vessels e-NOI, Answers to a Few Key VGP Questions, and Strategies to Meet the Requirements of the VGP

Monday, July 27, 2009  
1:00–3:00pm Eastern Time



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Jon Turvey, Holland America  
Lorena Johnston, Vane Brothers  
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# Guide to Our Webcasts

For Technical Support click the “**Help**” button

- **To Ask a Question** – Type your question in the text box located in the lower left-hand corner of your screen and click on the “Submit Question” button
- **To Answer a Poll Question** – Click on the radio button to the left of your choice and click submit. Do not type your answer in the “Ask a Question” box
- **To See Closed Captioning** – Turn your pop-up blocker off and click on the “closed captioning” button
- **To Complete the Survey** – Click on the “Enlarge Slides” button and answer the questions in the slide window
- **To Obtain a Certificate** – Watch 1 hour and 30 minutes of the webcast and then click “Download Certificate.” If you are in a room with multiple attendees please wait until the last slide to obtain the URL to customize your own certificates

# Agenda

- Vessels eNOI
- Answers to a Few Key VGP Questions
- Strategies to Meet the Requirements of the VGP

# Filing your NOI using EPA's eNOI system



**Jenny Jackson**

U.S. EPA Office of Wastewater Management  
Water Permits Division  
Washington D.C.

# Who must file an NOI

- Vessels greater than or equal to 300 gross tons
- Vessels that have the capacity to hold or discharge more than 8 cubic meters (2113 gallons) of ballast water
- Submittal deadline is **September 19, 2009** for existing vessels

## *1.5.1.1 Vessels Required to Submit Notices of Intent (NOIs)*

If your vessel is greater than or equal to 300 gross tons or the vessel has the capacity to hold or discharge more than 8 cubic meters (2113 gallons) of ballast water, you must submit a complete and accurate NOI in accordance with the requirements of Part 10 of this permit beginning on June 19, 2009 if you seek coverage under this permit. Submission must be in accordance with the deadlines in Table 1.

# Why use eNOI?

- Shorter time to process your NOI and receive coverage (up to 2 weeks faster!)
- Includes online instructions and help menus to guide you through the certification process
- Includes a batch upload feature to assist operators and owners who must file a significant number of NOIs
- Modify forms after submitted to EPA
- Save your forms as draft so you can complete them at a later time

**"Dunder Mifflin: limitless paper in a paperless world."**



# Getting Started

<http://cfpub.epa.gov/npdes/vessels/enoi.cfm>



## CDX Home

[Recent Announcements](#) | [Contact Us](#)

Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

- If you are new to CDX and wish to register, please click [here](#).
- If you already have a CDX ID and password, click [here](#).

We strongly encourage users of this site to employ the most recent version of Internet Explorer (do not download a beta version of Internet Explorer), because 128-bit encryption support is standard with this release. Users employing an earlier version of Internet Explorer may update their encryption support to enable 128-bit encryption support at (<http://www.microsoft.com/windows/ie/ie6/downloads/default.msp>).

- If you are new to CDX and wish to register, please click [here](#).
- If you already have a CDX ID and password, click [here](#).

1. Enter your name

2. Create user name and password

3. Decide on a secret question and answer. Remember your answer!

### CDX Registration: User Information

Use the TAB key to move from field to field. = **RE\*QUIRED FIELD**

First Name:   \*

Last Name:  \* Suffix:

Please choose a user name and password--the password must be at least 8 characters long and contain at least one number. Both passwords and user names are restricted to alpha-numeric characters and may not begin with a number or contain spaces or symbols, e.g. \$ # . " or @. Your user name should not be a part of your password. If you enter a user name which is in use, you will be asked to select a new user name.

User Name:  \*

(More than 7 characters; Don't use \$ # . " or @)

Password:  \*

Re-enter Password:  \*

(More than 7 characters w/1 number; Don't use \$ # . " or @)

The Help Desk will use the Secret Question and Answer to authenticate you if you forget your password. Please enter a secret question which has relevance to you and has an answer which is not easily guessed by others.

Secret Question:  \*

Secret Answer:  \*



Enter your  
address, email  
address, and  
phone number

Enter "DC" if you  
are outside the  
United States or  
Canada.

Enter "0" (zero) in  
the Zip Code/Postal  
Code text box if  
none exists.



**EPA will use the  
email address you  
enter here to send  
you correspondence.**

### CDX Registration: Organization Information

Use the TAB key to move from field to field. \* = REQUIRED FIELD

Organization Name:  \*

Registrant's Work Mailing Address 1:  \*

Registrant's Work Mailing Address 2:

City:  \*

State/Province: Alabama  \*

Zip/Postal Code:  \*

Country: UNITED STATES  \*

E-mail:  \*

Phone Number:  \* Ext.

U.S., Canada & Caribbean Islands Phone Format:

###-###-####

International Phone Format:

011 + Country Code + City Code<sup>1</sup> + Local Number

<sup>1</sup>As necessary.

# Important to remember

Only have one account! You will not be able to see all of your NOIs if you have multiple accounts with the same email address



# Add Program

Select “Stormwater Notice of Intent (eNOI) (SWENOI)”

## Add Program

- Assessment Cleanup and Redevelopment Exchange System (ACRES): ☐
- Environmental Appeals Board (EAB): ☐
- Electronic Inventory Update Reporting (EIUR): ☐
- Facility Registry System - Update Service (FRS-US): ☐
- Great Lakes Environmental Database Query System (GLENDA): ☐
- Lead-Based Paint Activities (LEAD): ☐
- LT2: LT2, Stage 2, and IDSE Plan/Report Entry (LT2): ☐
- National Environmental Methods Index Contaminants (NEMI-CBR): ☐
- Ozone Depleting Substances (ODS): ☐
- Office of Transportation and Air Quality Fuels Registration (OTAQREG): ☐
- Radionuclide NESHAPs (RAD): ☐
- Radiation Network (RADNET): ☐
- Risk Management Plan (RMPESUBMIT): ☐
- Stormwater Notice of Intent (eNOI) (SWENOI): ☒**
- Toxic Release Inventory Made Easy Web (TRIMEweb): ☐
- Toxic Substance Control Act - HaSD Form (TSCA-HASD): ☐
- Compliance Information Systems (VERIFY): ☐
- Request Manufacturer Code for OTAQ Compliance (VERIFY MFR REG): ☐
- Water Contaminant Information Tool (WCIT): ☐
- Audit Policy Self-Disclosure (eDisclosure): ☐

## Add Program ID

Use the TAB key to move from field to field. \* = REQUIRED FIELD

Role: BOTH  \*

Program ID Type: State  ID: VA  \*

Submission Method: WEBFORM  \*

ADD

Note: enter "DC" if you are outside the United States or Canada.

## Central Data Exchange - MyCDX

Welcome,  
Ms. Jennifer Jackson

Last Login: July 21, 2009  
Registered Since: June 15, 2009  
Recertification Date: June 15, 2009

CDX Registration Status: Active

You have 1 **new** message in your [Inbox](#)

[Change System  
Password](#)

[Edit Personal  
Information](#)

[Edit Current  
Account Profiles](#)

[Add New  
Employer Profile](#)

### Available Account Profiles:

- [SWENOI: Stormwater eNOI](#)

### Electronic Notice of Intent

Welcome to EPA's Electronic Notice of Intent (eNOI) system. eNOI is an online electronic permit application system that enables entities to submit NOI forms to EPA. Facilities can apply for coverage under EPA's NPDES Construction General Permit (CGP), Multi-Sector General Permit (MSGP), or the Vessels General Permit (VGP) via the eNOI system.

#### Select a radio button below to access eNOI:

☐ Stormwater eNOI

Facilities can submit, certify, view or terminate their Stormwater General Permit NOIs and waivers, which include the MSGP, the CGP, the NOE, and the LEW.


Users can also submit, certify, and view their MSGP monitoring and other reports

☒ Vessels eNOI

Vessel Owner/Operators can submit, certify, view, or terminate their Vessel General Permit NOI.

**Next**

# Enter a new form or edit / view an existing form



## Electronic Notice of Intent Online Application


U.S. Environmental Protection Agency

- HOME
- HELP
- PROFILE
- LOGOUT

Welcome to EPA's Electronic Notice of Intent (eNOI) System!


### Apply for coverage under an EPA Vessel General Permit


Use this section to fill out new forms to submit to EPA.


More information is provided by clicking on the  beside the questions. You may also click on "Help" in the header located at the top right of each page to view frequently asked questions and glossary terms


*Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.*


**\* Please provide data for the following field(s):**


\* Is your vessel greater than or equal to 300 gross tons?  Yes ☐ No ☐


\* Does your vessel have the capacity to hold or discharge more than 8 cubic meters(2113 gallons) of ballast water?  Yes ☐ No ☐


\* Are you a commercial fishing vessel or a vessel < 79 feet in length that does not discharge ballast water?  Yes ☐ No ☐

\* Please select the primary type of your vessel:  Commercial Fishing Vessel with Ballast Water

\* Do you have an EIN number?  Yes ☐ No ☐

\* Do you have a Company IMO number?  Yes ☐ No ☐

\* Please enter the Vessel Owner/Operator Name: 



#### Tips



- Who must file an NOI?
- How do I obtain coverage?
- What is the eNOI Process?
- When should I submit an NOI?
- How do I change my account information?
- Vessel General Permit website
- Download the VGP PDF application

### Applications Assigned to you or Results of Search


Use this section to complete any draft forms you have saved, certify any submitted forms (if you are a certifying official), view or edit any existing forms, terminate permit coverage, or apply for coverage under a new permit using some of the data from an existing NOI.

Please select the action you'd like to take from the drop-down list in the "Action" column and hit "GO" to proceed.

**Filter by:**

Tracking Number	Vessel Identifier/Name	EIN/IMO or Owner/Operator	Date Created (Format: mm/dd/yyyy)	Postmark Date (Format: mm/dd/yyyy)	Status
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> 	<input type="text"/> 	<input type="text"/>

Results Displayed:  Sort By:  Order:

Tracking Number	Date of Coverage	Post Mark Date	Owner/Operator Name	Vessel Identifier	Vessel Name	Status 	Actions
VPAAA014C			test	ghj	ghj	Confirmed	<input type="text"/> <input type="button" value="Go"/>
VPAAA013C	07-10-2009		test edit function	12345		Active	<input type="text"/> <input type="button" value="Go"/>

Page 1 of 1



## Electronic Notice of Intent Online Application

U.S. Environmental Protection Agency

- HOME
- HELP
- PROFILE
- LOGOUT

### User Profile

#### User Profile

##### User Information

You can change your role and view information below by clicking "Save" button. To change any other profile information, please click on [MyCDX link](#)

If you have questions regarding the registration, changing your email or your account please visit CDX Frequently Asked Questions <https://cdx.epa.gov/SSL/cdx/FAQ.asp> or contact CDX using the following options:

- By Telephone:  
Person-to-person telephone support is available from 8:00 am to 6:00 pm (EST). Call our toll-free line at 888-890-1995.
- By E-mail:  
Send e-mail to Technical Support at [EPACDX@CSC.COM](mailto:EPACDX@CSC.COM) with "Technical Support" in the Subject line.
- By Fax:  
Assistance requests are accepted 24 hours a day at 301-429-3905. Support personnel will respond to faxed requests Monday through Friday from 8:00 am to 6:00 pm EST/EDT.

First Name: jennifer

Last Name: jackson

Company: epa

Address Line1:

City: washington

State: DC

ZIP: 20460

Role: Certifier

Default View: Standard View

Question 1 : ?

Question 2 : ?

Answer 1 : ?

Answer 2 : ?

Cancel

Save

On this page you can change your role.

To change your name, address, or email address click the "MyCDX Link."

## Section I: Owner/Operator Information

Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.

**\* Please provide data for the following field(s):**

**\*Vessel Owner/Operator Name:**

**\*Address Line 1:**

**Address Line 2:**

**Country:**

**City:**

**State :**

**ZIP Code:**

**Phone:**

**Fax(Optional):**

**\*Vessel Company Email:**

**\*Confirm Vessel Company Email:**

**Point of Contact Name:**

**Point of Contact Email:**

**Confirm Point of Contact Email:**

**NPDES Online Stormwater Perm...**

**Point of Contact Name**

The Point of Contact Name should be the name of the person, other than the Certifying Official, who is authorized to view the vessel's Notice of Intent and is able to answer any questions about the vessel's discharge. This person can be a staff person within the owner/operator's organization, such as a vessel master, vessel manager, or fleet manager.

**Previous**

**Next**

By selecting Next you are ensuring that the information provided is correct. If incorrect, press the previous button and modify your operator's information



Operator  
Information

Vessel  
Information

Vessel Voyage  
Information

Discharge  
Information

Review

Certification

## Section II: Vessel Information

*Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.*

**\* Please provide data for the following field(s):**

Vessel Name:

**\*Vessel Identifier:**

**\*Vessel Identifier Type:**

Vessel Call Sign :

Flag State/Port of Registry :

- \*Type of Vessel :**
- ☒ Commercial Fishing Vessel with Ballast Water
  - ☐ Medium Cruise Ship (100 to 499 passengers)
  - ☐ Large Cruise Ship (500+ passengers)
  - ☐ Large Ferry (250+ passengers or more than 100 tons of cargo, e.g., cars, trucks, trains, or other land-based transportation.)
  - ☐ Barge
  - ☐ Oil or Gas Tanker
  - ☐ Research Vessel
  - ☐ Emergency Vessel
  - ☐ Other

**Vessel Dimensions :** Weight:  ☐ gross tons ☐ gross registered tons

Length:  ☐ feet ☐ meters

**st Water Capacity :**  ☐ gallons ☐ meters<sup>3</sup>

Previous

Next

If you want to stop work and return later, select the "Save as Draft" button below. Selecting this button takes you out of the eNOI System and saves your work so that you can return later. You do not need to save your work as you move from screen to screen.

Save as Draft

### NPDES Online Stormwater Perm...

#### Vessel Identifier

Please enter the official identifier of the Vessel that will be covered under this Notice of Intent. The vessel identifier, such as the vessel ID, registered number, vessel IMO number, or other identification should be entered in this field.



## Section II: Vessel Information

*Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.*

Indicate whether the vessel currently holds or has ever held a NPDES permit. Include the Permit number and dates of permit coverage. If the vessel is covered under this General Permit and this NOI is being submitted for a transfer of ownership to continue coverage, check the appropriate box, and include the date of transfer.

**\* Please provide data for the following field(s):**

\*Year Vessel Built:



\*Date of last dry-dock:



(Format: mm/dd/yyyy)

\*Date of next scheduled/anticipated dry-dock:



(Format: mm/dd/yyyy)

\*Does the vessel have onboard treatment systems for any other waste stream covered by this permit (e.g. Advanced Wastewater Treatment System for Graywater, Oily Water Separator)?

☐ Yes

☐ No

How often is the ballast tank cleaned and sediment disposed of?



How and where do you typically dispose of ballast tank sediment?

\*Does vessel have an existing ballast water management plan?

☐ Yes

☐ No

\*Type of anti-fouling hull coating on the vessel:



\*When anti-fouling hull coating was last applied:



(Format: mm/dd/yyyy)

Describe hull husbandry practices, such as frequency of cleaning, method used, etc:

(Maximum field length 875 characters)

Operator  
Information

Vessel  
Information

Vessel Voyage  
Information

Discharge  
Information


Review

Certification

## Section II: Vessel Information

\*Does vessel currently have, or has vessel ever held, an NPDES permit, for any part, discharge, or operation of the vessel?

☐ Yes

☐ No 

\*If yes, please provide the following:

\*Permit Number:

\*Dates of Coverage:



(Format: mm/dd/yyyy)

\*Is this a transfer of ownership?

☐ Yes

☐ No

\*If yes, provide the date of transfer:



(Format: mm/dd/yyyy)

Previous

Next

If you want to stop work and return later, select the "Save as Draft" button below. Selecting this button takes you out of the eNOI System and saves your work so that you can return later. You do not need to save your work as you move from screen to screen.

Save as Draft

Operator  
Information

Vessel  
Information

Vessel Voyage  
Information

Discharge  
Information

Review

Certification

### Section III: Vessel Voyage Information

*Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.*

Enter the vessel Home Port, or if it does not have a Home Port, enter the US Port it most frequently visits. Provide the name of each US Port the vessel may visit during the Permit term. This list does not need to be exhaustive, but should be based on Ports visited in the past and should be representative of the geographic area in which the vessel travels. Also indicate Crew Capacity, that is, the number of crew needed for or normally used for operating the vessel.

**\* Please provide data for the following field(s):**

Home Port / Most Frequented US Port:

US Ports Vessel Anticipates  
Visiting During Permit Term:

**\*Number of overnight berths :**

Passenger :

Crew :


**\*Maximum capacity :**

Passenger :

Crew :


**\*Does vessel travel beyond the US EEZ and  
more than 200nm from any shore?**

☐ Yes

☐ No 

**\*Is the vessel engaged in Pacific Nearshore Voyages?**

☐ Yes

☐ No 

Previous

Next

If you want to stop work and return later, select the "Save as Draft" button below. Selecting this button takes you out of the eNOI System and saves your work so that you can return later. You do not need to save your work as you move from screen to screen.

Save as Draft

Operator  
Information

Vessel  
Information

Vessel Voyage  
Information

Discharge  
Information

Review

Certification

## Section IV: Discharge Information

*Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.*

From the list provided, select each applicable discharge type that your vessel may create.

**\* Please provide data for the following field(s):**

**\* all applicable discharges vessel may generate:** 

- |   |   |
|---|---|
| <input type="checkbox"/> Deck Washdown and Runoff   | <input type="checkbox"/> Gas Turbine Wash Water                     |
| <input type="checkbox"/> Bilgewater / Oily Water Separator Effluent                                   | <input type="checkbox"/> Graywater                                  |
| <input type="checkbox"/> Ballast Water  | <input type="checkbox"/> Motor Gasoline and Compensating Discharge  |
| <input type="checkbox"/> Anti-fouling hull coatings   | <input type="checkbox"/> Non-Oily Machinery Wastewater              |
| <input type="checkbox"/> Aqueous Film Forming Foams (AFFF)  | <input type="checkbox"/> Refrigeration and Air Condensate Discharge |
| <input type="checkbox"/> Boiler/Economizer Blowdown   | <input type="checkbox"/> Seawater Cooling Overboard Discharge       |
| <input type="checkbox"/> Cathodic Protection  | <input type="checkbox"/> Seawater Piping Biofouling Prevention      |
| <input type="checkbox"/> Chain Locker Effluent  | <input type="checkbox"/> Small Boat Engine Wet Exhaust              |
| <input type="checkbox"/> Controllable Pitch Propeller Hydraulic Fluid and other Oil-to-Sea Interfaces | <input type="checkbox"/> Sonar Dome Discharge                       |
| <input type="checkbox"/> Distillation or Reverse Osmosis Brine  | <input type="checkbox"/> Underwater Ship Husbandry                  |
| <input type="checkbox"/> Elevator Pit Effluent  | <input type="checkbox"/> Welldeck Discharges                        |
| <input type="checkbox"/> Firemain Systems   | <input type="checkbox"/> Graywater Mixed with Sewage                |
| <input type="checkbox"/> Freshwater Layup   | <input type="checkbox"/> Exhaust Gas Scrubber Washwater Discharge   |

Previous

Next

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Save as Draft

Operator  
Information

Vessel  
Information

Vessel Voyage  
Information

Discharge  
Information

Review

Certification

## Section IV: Discharge Information

*Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.*

**\* Please provide data for the following field(s):**

**\*Does Vessel ever engage in or have capacity to engage in industrial operations?**

☐ Yes ☐ No 

**\*If yes, please select appropriate box:**


☐ Seafood Processing

☐ Energy Exploration

☐ Mining

☐ Other

**\*Will the vessel be using an experimental ballast water treatment system which discharges residual biocides or derivatives?**

☐ Yes ☐ No 

**If yes, are biocide concentrations below those listed in Part 5.8 of the Permit?**

☐ Yes ☐ No

**Select the biocide residuals or derivatives that may be discharged by the ballast water treatment system:**

Other

Previous

Next

If you want to stop work and return later, select the "Save as Draft" button below. Selecting this button takes you out of the eNOI System and saves your work so that you can return later. You do not need to save your work as you move from screen to screen.

Save as Draft

# Review Page – Almost Done!

Operator Information	Vessel Information	Vessel Voyage Information	Discharge Information	Review	Certification
<b>Form Review</b>					
<b>Vessel General Permit Review</b>					
					
Please confirm that all of the information on your NOI is correct. If the information is correct, please print this page for your records until you receive an email with the attached NOI from EPA. Then click the "Confirm and Continue" button to go forward.					
<b>Owner/Operator Information (Edit)</b>					
Vessel Owner/Operator Name: dtd					
IRS EIN:					
IMO:					
Country: Afghanistan					
Address: hjhjh st					
City/State/ZIP:					
Phone:					
Fax:					
Vessel Company Email: blank@blank2.com					
Point of Contact Name:					
Point of Contact Email:					
<b>Vessel Information (Edit)</b>					
Vessel Name: hjhjh					
Vessel Identifier: 12					
Vessel Identifier Type: Registered Number					
Vessel Call Sign:					
Flag State/Port of Registry:					
Type of Vessel: Commercial Fishing Vessel with Ballast Water					
Vessel Dimensions: Weight: Length:					
Ballast Water Capacity:					
Year Vessel Built: 1999					
Date of last dry-dock: 07/10/2009					
Date of next scheduled/anticipated dry-dock: 07/16/2009					
How often is the ballast tank cleaned and sediment disposed of?					
How and where do you typically dispose of ballast tank sediment?					
Does vessel have an existing ballast water management plan? N					
Type of anti-fouling hull coating on the vessel: hjhjh					
When anti-fouling hull coating was last applied: 07/09/2009					
Describe hull husbandry practices, such as frequency of cleaning, method used, etc:					
Does vessel currently have, or has vessel ever held, an NPDES permit, for any port, discharge, or operation of the vessel? N					
Permit Number:					
Dates of Coverage:					
Is this a transfer of ownership? N					
Date of Transfer:					

Check to make sure your information is complete and accurate on the review page.

Then hit “Confirm and continue”.


# Designate Certifying Official

One of the following screens will be displayed if the user registered as staff


## Designate Certifying official

Please Submit to: 

Enter the e-mail address carefully. Only the person with the e-mail address specified by you will be able to retrieve this NOE to certify it.

Certifying Official Name:  Roshini  Bhalla

Certifying Official Title:  President

Certifying Official Email:  roshini.bhall@tetrattech-ffx.com


Confirm Certifying Official Email:  roshini.bhall@tetrattech-ffx.com


Clicking "Next" will cause your NOE information to be forwarded to the certifying official you specified above.

There is no waiting period associated with this form. However, coverage does not begin until after the certifying official you listed above certifies the form.

Previous

Submit

Please Submit to: 

☐ Previous Certifying official:  Roshini Bhalla - roshini.bhall@tetrattech-ffx.com 

To change the email of the previous certifying official enter new email below.

Certifying Official Email:


Confirm Certifying Official Email:

☐ New Certifying Official:

Enter the e-mail address carefully. Only the person with the e-mail address specified by you will be able to retrieve this NOE to certify it.

Certifying Official Name: 

Certifying Official Title: 

Certifying Official Email: 

Confirm Certifying Official Email:

Clicking "Next" will cause your NOE information to be forwarded to the certifying official you specified above.



Enter the same email address that is associated with the certifier's account.

This screen is displayed if there are no certifiers associated yet with the facility/site.

This screen is displayed if there are certifiers already associated with the facility/site. There are two options: select a previous certifier or enter a new one.






# Certification Information



One of the following screens will be displayed if the user registered as a certifier.


## Certification Information

For your Security, please complete TWO of the qualifying questions:

Question 1 :  In what city were you born? 

Answer 1 : 

Question 2 :  In what year did you graduate high school? (YYYY) 

Answer 2 : 

I certify under penalty of law that I meet the eligibility conditions of this permit and that this document and all of its attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.



☐ I Accept ☐ I do not Accept


**Submit**



This screen is displayed the very first time a certifier signs the form if he filled out the form himself.

## Certification Information

To certify your eNOI, please answer TWO of the following questions:

Question 1 :  Which high school you graduated from? 

Answer 1 : 

Question 2 :  In what city were you born? 

Answer 2 : 

After reviewing the form information, I hereby:

- ☐ Require further review and therefore will hold on certifying this form.  
☐ Require that this form is sent back to my staffer for further modifications.

Comment :

- ☐ Approve of the information and wish to certify.

I certify under penalty of law that I meet the eligibility conditions of this permit and that this document and all of its attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

☐ I Accept ☐ I do not Accept

This screen is displayed if a staff person submitted the form to the certifier for signing. It allows the certifier to 1) save the form to review it further, 2) send it back to the staff person with comments, or 3) approve and certify the form.



# Confirmation

You will receive a "Thank You" page *and* an automatically generated email will be sent to you.

Applications Assigned to you or Results of Search

Use this section to complete any draft forms you have saved, certify any submitted forms (if you are a certifying official), view or edit any existing forms, terminate permit coverage, or apply for coverage under a new permit using some of the data from an existing NOI. Please select the action you'd like to take from the drop-down list in the "Action" column and hit "GO" to proceed.

Filter by:

Tracking Number	Vessel Identifier/Name	EIN/IMO or Owner/Operator	Date Created (Format: mm/dd/yyyy)	Postmark Date (Format: mm/dd/yyyy)	Status
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Results Displayed: 10  
Sort By: Any  
Order: Descending

Page 1 of 1

Tracking Number	Date of Coverage	Post Mark Date	Owner/Operator Name	Vessel Identifier	Vessel Name	Status	Actions
VPAAA014C			test	ghj	ghj	Confirmed	<input type="text"/>
VPAAA013C	07-10-2009		test edit function	12345		Active	<input type="text"/>

EPA U.S. Environmental Protection Agency

View  
Edit  
Edit Owner Operator  
Apply using this data

Review

History

## Correspondence Status

Acknowledgement	Letter	Sent Date
VeNOI PDF	PDF	07/10/2009
VeNOI Acknowledgement Letter	RTF	07/10/2009

## Permit Status

Status	Updated By	Updated Date
Active	SysAdmin SysAdmin	07/10/2009
Certified	jennifer jackson	07/10/2009
Confirmed	jennifer jackson	07/10/2009

Previous

# Batch Upload


- For users who must submit a significant number of NOIs at the same time, EPA has created a batch upload spreadsheet. This batch upload feature is a template designed with **Microsoft Excel 2003**. This function may save time for users who have numerous vessels and already have much of the data gathered in existing databases.
- The batch upload tool is designed for users who have database experience and who have significant numbers of vessels (e.g., more than 100)
- For users who **do not** have significant numbers of vessels, or do not already have much of the information gathered in an existing database, the **standard** e-NOI interface is a more user friendly approach and may be more efficient.
- The batch upload tool and the instructions can be found on EPA's National Pollutant Discharge Elimination System (NPDES) vessel's eNOI Web site ([www.epa.gov/npdes/vessels/eNOI](http://www.epa.gov/npdes/vessels/eNOI))

# Batch Upload Continued

Note: Only the eNOI user registered as "Staff" will have access to this batch upload function


Apply for coverage under an EPA Vessel General Permit


Use this section to fill out new forms to submit to EPA.


More information is provided by clicking on the  beside the questions. You may also click on "Help" in the header located at the top right of each page to view frequently asked questions and glossary terms



*Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.*


\* Please provide data for the following field(s):


\* Is your vessel greater than or equal to 300 gross tons?  Yes ☐ No ☐



\* Does your vessel have the capacity to hold or discharge more than 8 cubic meters(2113 gallons) of ballast water?  Yes ☐ No ☐


\* Are you a commercial fishing vessel or a vessel < 79 feet in length that does not discharge ballast water?  Yes ☐ No ☐

\* Please select the primary type of your vessel:   
Commercial Fishing Vessel with Ballast Water 

\* Do you have an EIN number?  Yes ☐ No ☐

\* Do you have a Company IMO number?  Yes ☐ No ☐

\* Please enter the Vessel Owner/Operator Name:   

For batch upload, please click "Batch Upload" button 

# Resources

## Registration Questions

If you have questions regarding registration, changing your email or your account please visit CDX Frequently Asked Questions (<https://cdx.epa.gov/SSL/cdx/FAQ.asp>) or contact CDX using the following options:

- Telephone: 888-890-1995 (available M-F 8:00 am to 6:00 pm (EST)).
- E-mail: Send an e-mail to Technical Support at [epacdx@csc.com](mailto:epacdx@csc.com) with “Technical Support” in the Subject line.
- Fax: 301-429-3905 (responses sent M-F 8:00 am to 6:00 pm (EST)).

## eNOI System Questions

If you have questions about the eNOI system, check the website ([www.epa.gov/npdes/vessels](http://www.epa.gov/npdes/vessels)) or contact the EPA's NOI Processing using the following options:

- Telephone: 866-352-7755 (available M-F 8:00 am to 5:00 pm (EST)).
- E-mail: Send an e-mail to Technical Support at [noi@avanticorporation.com](mailto:noi@avanticorporation.com)
- Webform: Fill out the online form at [www.epa.gov/npdes/noicontact](http://www.epa.gov/npdes/noicontact)

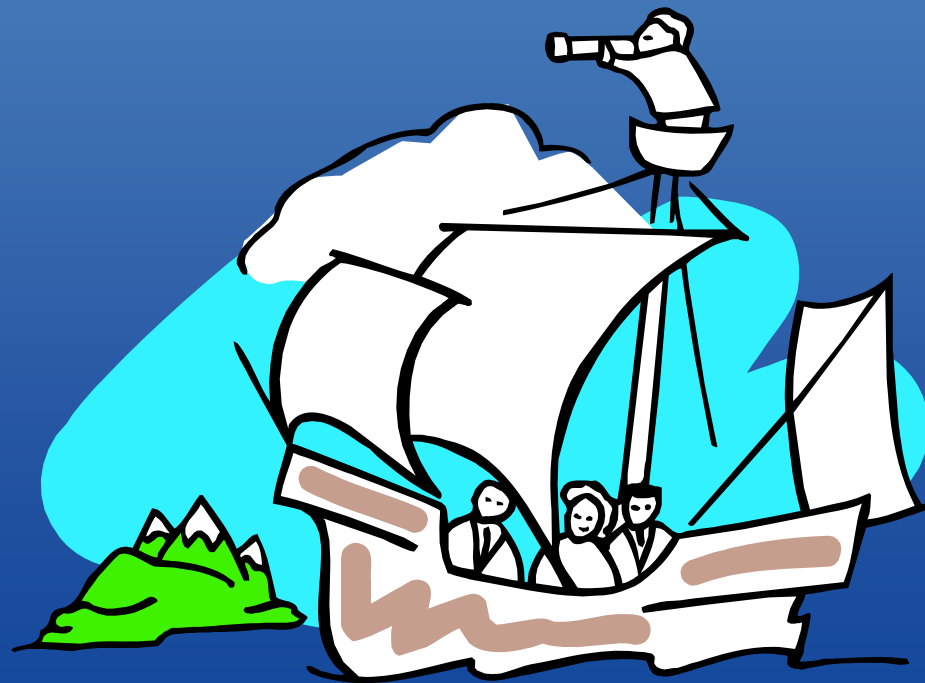


# Questions



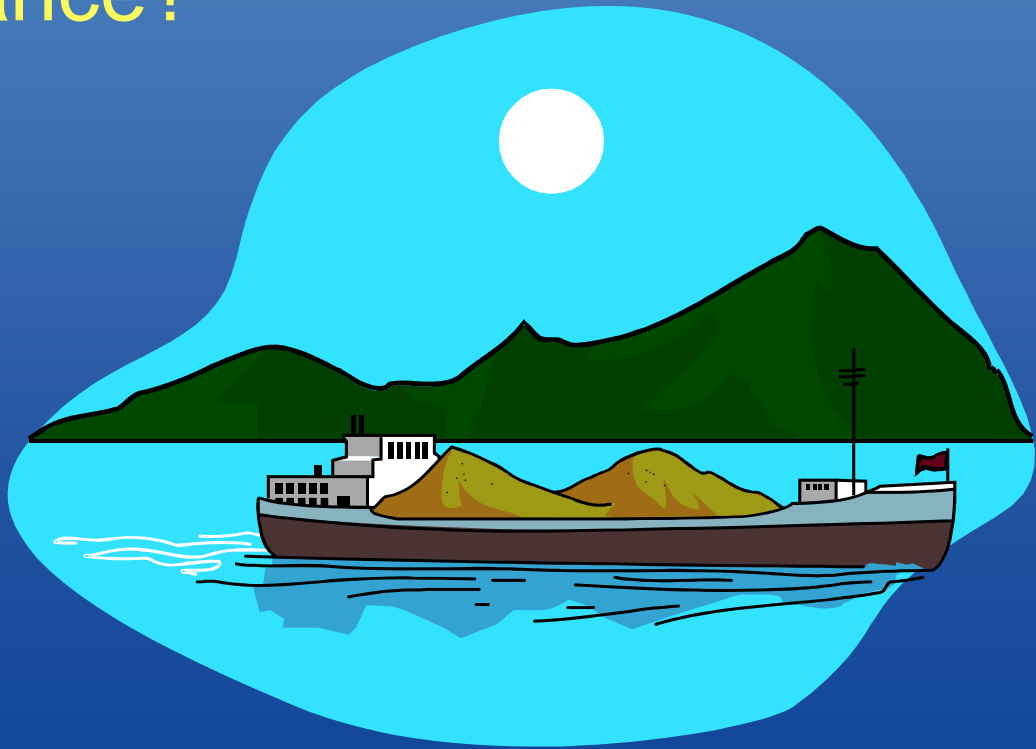
# Frequently Asked Question (FAQ) #1

- For the purposes of the VGP, what constitutes a voyage?



## FAQ #2

- Where the owner and operator of a vessel differ, who is ultimately responsible for permit compliance?



## FAQ #3

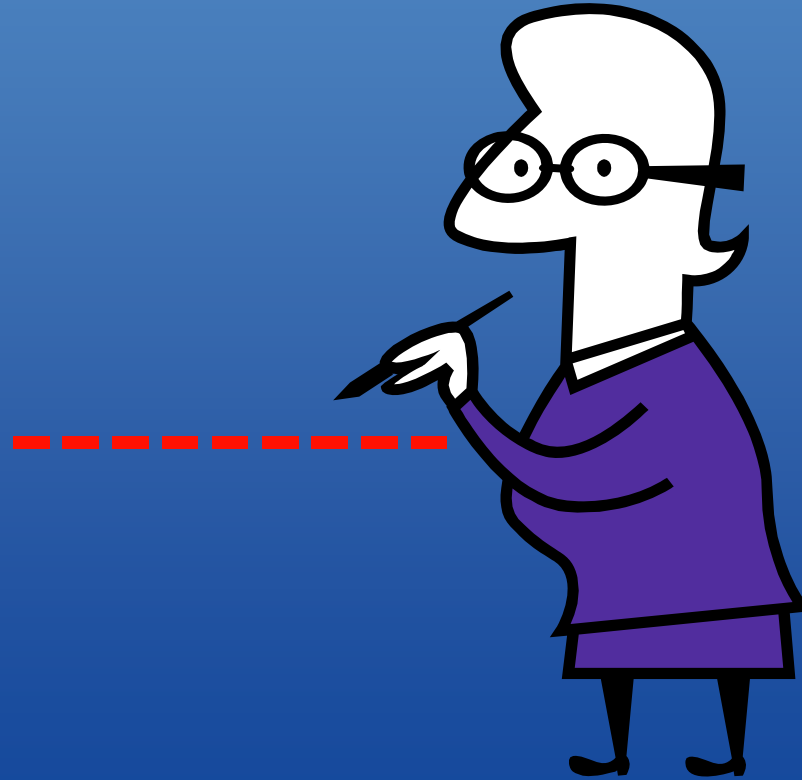
- In the case of a vessel being towed by another vessel owned by a different company, which company is responsible for NPDES compliance issues?





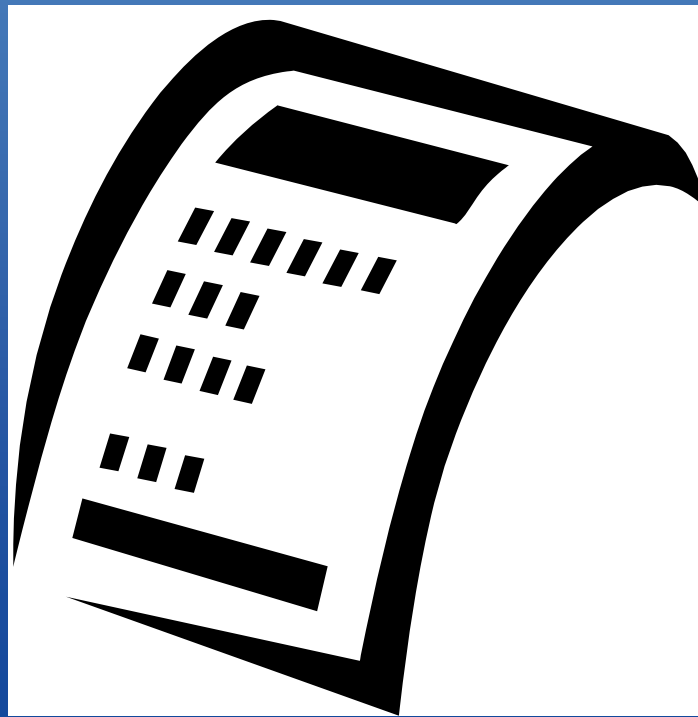
# FAQ #4

- Who must submit the NOI?



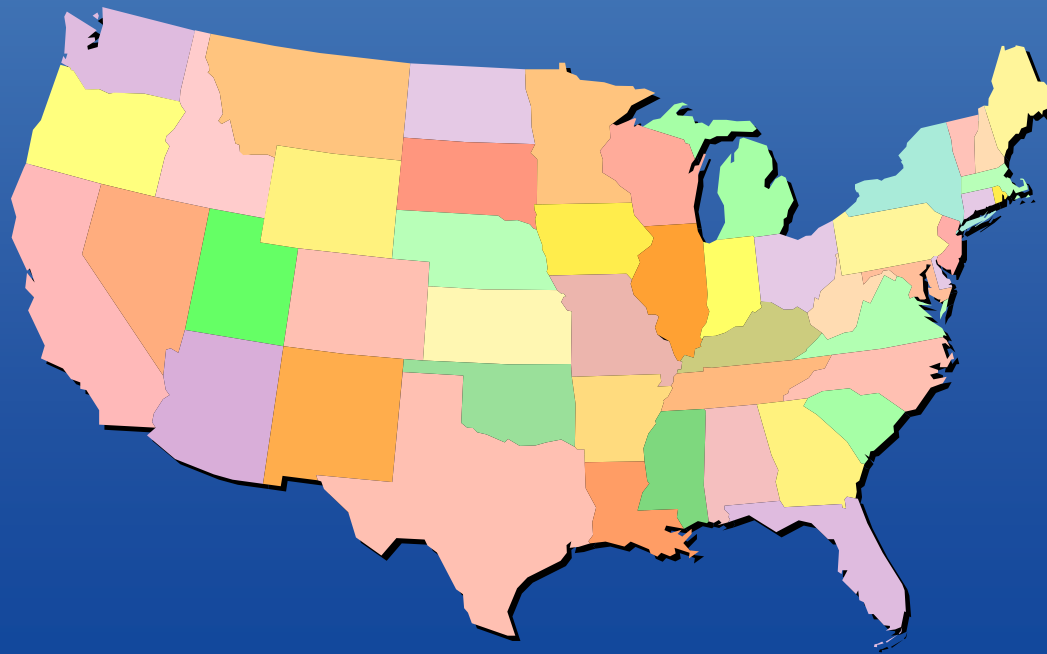
## FAQ #5

- Is a written document provided to confirm submittal and receipt of the NOI?



## FAQ #6

- How must vessels calling in multiple states address individual state requirements under Section 401?



# FAQ #7

- How will EPA apply this permit to vessels that travel to the US only very rarely (less than once a year)? Will there be flexibility of some sort, e.g. exemptions granted?



# EPA Vessel General Permit



**Jonathan Turvey**

Holland America Line

[jturvey@hollandamerica.com](mailto:jturvey@hollandamerica.com)

# EPA VGP “Gems”

- Permit administration vs. Best Management Practice implementation
- Standards adopted by reference
- Quarterly sampling
- Determination of non-compliance



# Best Management Practices vs. Permit Administration

- BMPs largely reflect industry practice
- **New** administrative processes must be built to address **new** requirements
  - Routine Visual Inspections
  - Corrective action
  - Annual Non-Compliance reporting
  - Other Recordkeeping

# Routine Visual Inspections



- Simple concepts can be a challenge to implement in the field
  - Using Forms & Filling them out correctly
  - “in and out” itineraries



- Quarterly monitoring
  - Challenge of access / “where accessible”
  - What do you see?



# Quarterly Analytical Sampling



- Alaska permit drives Additional Sampling
  - ADEC Permit
  - Murkowski sampling
- General Permit Standards require reporting additional samples
- Sampling when discharging in permit waters?

# EPA VGP “Gems”

- Standards Adopted by Reference
  - Standard Permitting Conditions of **40 CFR Part 122.41**
  - Signatory Requirements of **40 CFR Part 122.22**
  - Secondary Treatment Standards of **40 CFR Part 133**



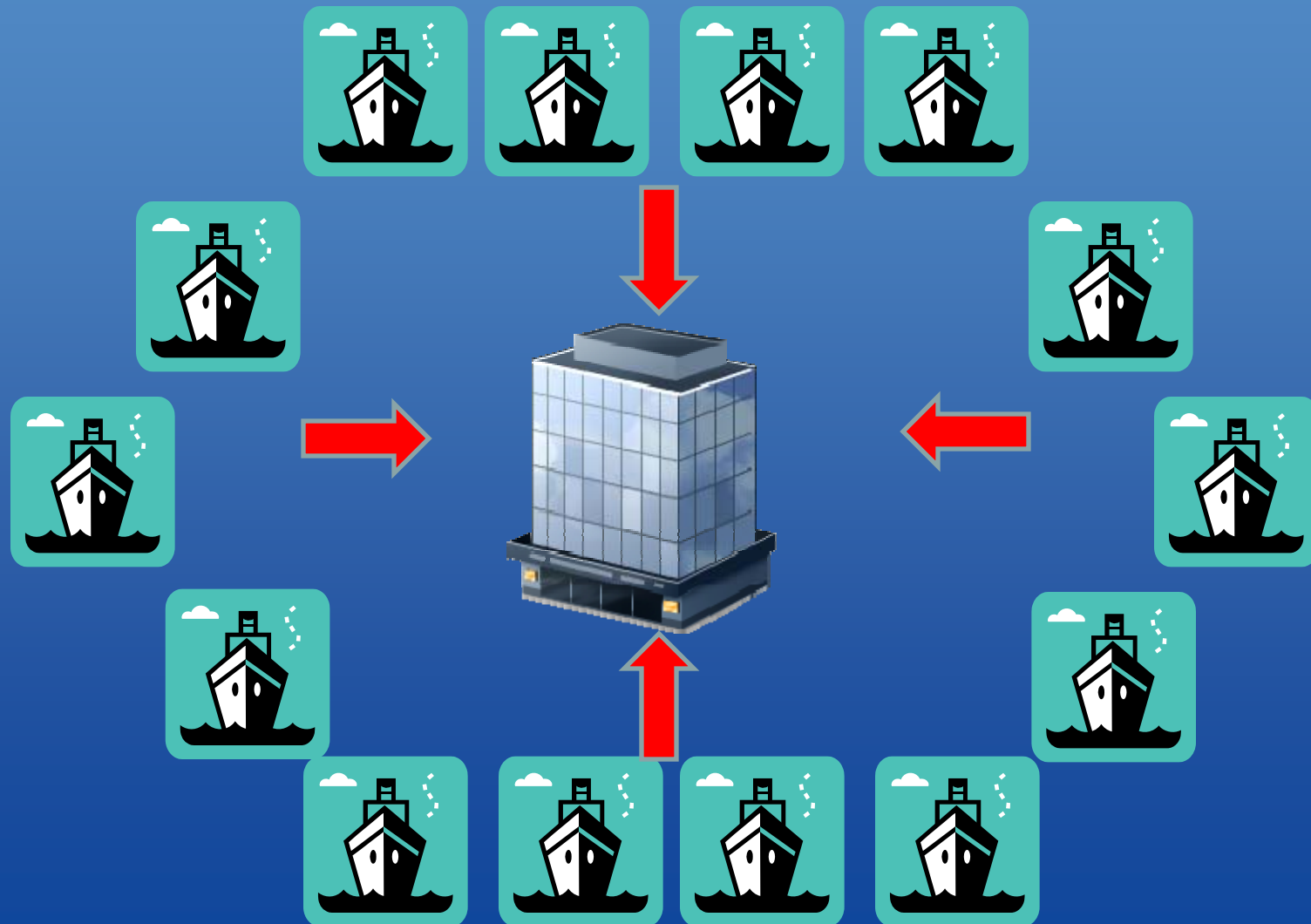
## §4.4 Reporting

- Reporting Non-Compliance
- Reportable Quantities of Hazardous Substances or Oil
- Additional reporting
- One-Time Permit Report
- See Standard Permit Conditions at 40 CFR 122.41 for required information

## §4.4.3 Additional Reporting

- Standard Reporting Requirements of §1.13
- Additional Reporting to the appropriate EPA Regional Office
  - **24 hour oral report** of non-compliance *which may endanger health or the environment*
  - **5 day written follow-up** reporting to the 24 hour reporting

# Fleet Wide Roll-up of Compliance Data



# Compliance Determination, Three Step Process:

**1. Observation of  
Discrepancy?**

**2. Identify the  
Applicable Effluent  
Limit?**

**3. Make your  
Compliance  
Determination**

Example: What effluent limit applies if you overfilled a potable water tank and it discharged from the vent pipe?

# §4.4.1 Non-Compliance Reporting

- Report *ALL* instances of non-compliance at least once per year
- To the Regional Office where the greatest number of non-compliance events occurred



# Don't forget the Certification

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate and complete. I have no personal knowledge that the information submitted is other than true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



# Future Challenges



- Multiple jurisdictions complicate requirements
- State 401 Certifications? / Authorization?



# Vane Line Bunkering, Inc.

Working to set the standard of excellence in the maritime industry for over a century.

**Lorena Johnston**

# Discharges From Towing Vessel and Barges

- Material Storage
- Toxic and Hazardous Materials
- Fuels Spills/Overflows
- Discharges of Oil Including Oily Mixtures
- Deck Washdown and Runoff and Above Water Line Cleaning
- Bilgewater

# Discharges From Towing Vessels and Barges (Cont)

- Ballast Water
- Cathodic Protection
- Wire Rope and Mechanical Equipment Subject to Immersion
- Firemain Systems
- Graywater
- Refrigeration and Air Condensate Discharge

# Vessel General Permit Records Book

**National Pollutant Discharge  
Elimination System (NPDES)**



**Vane Line Bunkering, Inc.  
Vessel General Permit  
(Records)**

Face to Face indoctrination of the VGP Records Book was conducted as soon as the final permit was released in February

A second book was provided with a complete Vessel General Permit, Fact Sheet and all other required documentation as noted in the VGP

# AWO Recommended Practice Guide

## **AWO Recommended Practice Guide**

**EPA Vessel General Permit for Discharges  
Incidental to the Normal Operation of Vessels**



**The American  
Waterways  
Operators**

**January 16, 2009**

Vane Line Bunkering has incorporated AWO's Recommended Practice Guide into our Vessel General Permit (VGP) Records Book

We have found this to be the most practical way to inform and educate our mariners how the NPDES VGP requirements are relevant to the tug and barge industry and the most practical way to incorporate this into their everyday tasks.





# Routine Inspections

## Routine Inspection Guidelines

**Routine Inspection Guidelines** - The following potential sources of discharge must be inspected every week on your tug/barge:

- ☐ 1. **Anchor and chain** - Clean
- ☐ 2. **Wire rope** - Clean and free of excessive grease
- ☐ 3. **Deckboxes** - Not draining contaminated water
- ☐ 4. **Scuppers** - In good working order
- ☐ 5. **Fuel and Oil Transfer Hoses** - Product not leaking from connections, blanks or quick releases
- ☐ 6. **Oil Transfer Pipeline** - Blanks properly secured with all bolts and gasket, not leaking
- ☐ 7. **Air fittings** - Chicago and quick release fittings are properly capped and not leaking water or pneumatic tool oil
- ☐ 8. **Spill Containment** - Not leaking and excessive product cleaned out
  - ☐ 55 Gal. Drums on Deck - Connections and seals not leaking
- ☐ 9. **Fuel tank vents** - Not leaking fuel and containment available when transferring
- ☐ 10. **Valves** - Rising stems free of excessive lubricant, packing grease and fitting in good working order
- ☐ 11. **Trash Cans on Deck** - Not leaking oily waste onto deck, located inside containment or indoors out of weather
- ☐ 12. **Cargo Pumps** - Clean and free of excessive lubrication or product that could be washed overboard with rain water
  - ☐ Engine compartments - Clean and free of oil, antifreeze and fuel
- ☐ 13. **Fuel Lines** - In good condition and not leaking
- ☐ 14. **Hydraulic Crane** - Not leaking oil
- ☐ 15. **Hydraulic Hoses** - In good condition and not leaking
- ☐ 16. **Hydraulic Reservoir** - Not overfilled or leaking, sight glass (if applicable) sealed and in good working order
- ☐ 17. **Mechanical winches** - Gears free of excessive grease
- ☐ 18. **Open gauging tubes** - Surrounding area clean and free of standing product
- ☐ 19. **Hydraulic Capstans** - Not leaking and free of excessive lubricant
- ☐ 20. **Cargo Domes** - Hatches not leaking
- ☐ 21. **Hydraulic Control Valves** - In good working order and not leaking
- ☐ 22. **Moorings Limer** - Not soaked with oily product
- ☐ 23. **Portable Pumps and Generators** - Fuel cap not leaking, engine not leaking, fuel lines not leaking
- ☐ 24. **Secondary Containment** - Not left on deck to fill up with rain water or blow overboard, cleaned out after use and properly stowed
  - ☐ Oily Rags - Properly disposed of and not left on deck
- ☐ 25. **Absorbent Spill pads** - Not left on deck after use for clean up
- ☐ 26. **Deck Area** - Deck clean of product, garbage, oil samples, debris
- ☐ 27. **Surrounding Water** - Free of visible sheen, foam or other signs of oily discharge
- ☐ 28. **Hazardous Materials** - Properly stowed, contained and labeled

We provide the following guidelines to aid our mariners in conducting the Routine Inspections on their vessels

Routine inspection concerns are communicated to landbased employees during their routine vessel visits

# Recordkeeping

## NPDES / VGP ROUTINE INSPECTION

A routine visual inspection of all areas addressed in the NPDES Vessel General Permit, Part 2.1 has been conducted in accordance with VGP, Part 4.1 Self Inspections and Monitoring. Visual inspection was conducted to ensure compliance within the following categories: Material Storage, Toxic and Hazardous Materials, Fuel Spills/Overflows and Discharges of Oil Including Oily Mixtures.

Vessel Name: \_\_\_\_\_

Inspected By: _____ Date/Time: _____ Location: _____ Signature: _____	Potential Problems, Sources of Contamination? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, record on Discrepancy Form
Inspected By: _____ Date/Time: _____ Location: _____ Signature: _____	Potential Problems, Sources of Contamination? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, record on Discrepancy Form
Inspected By: _____ Date/Time: _____ Location: _____ Signature: _____	Potential Problems, Sources of Contamination? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, record on Discrepancy Form
Inspected By: _____ Date/Time: _____ Location: _____ Signature: _____	Potential Problems, Sources of Contamination? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, record on Discrepancy Form
Inspected By: _____ Date/Time: _____ Location: _____ Signature: _____	Potential Problems, Sources of Contamination? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, record on Discrepancy Form
Inspected By: _____ Date/Time: _____ Location: _____ Signature: _____	Potential Problems, Sources of Contamination? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, record on Discrepancy Form

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

 VANE BROTHERS

This form is provided to our vessels to record their Routine Inspections

The book also contains, in sequential order, the additional forms required for any Discrepancies found or Corrective Actions necessary

 VANE BROTHERS



# Unmanned Barges



For unmanned equipment we maintain the same Routine Inspection requirements that the rest of our fleet must comply with.

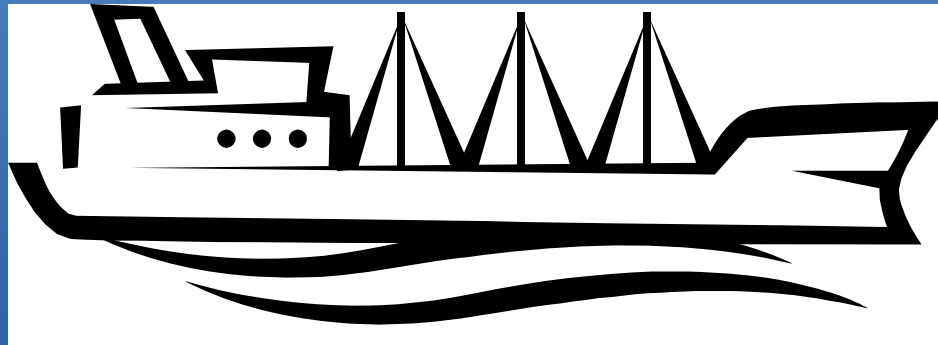
In most cases inspections are done weekly or as otherwise required.



# Reporting

- Accidental Discharge/Spill Notifications Form and procedures along with Non-Compliance Notifications are reported to the EPA along with required authorities by landbased Operations Department Personnel
- Records are kept for the required three year period

# Vessel *General Permit* Challenges and Solutions



Kuldeep Singh  
Gallagher Marine Systems  
[www.gallaghermarine.com](http://www.gallaghermarine.com)

# What are we discussing?

Challenges Posed by VGP

&

Solutions to these challenges

# General Issues with Compliance

- Regulatory Landscape – Ever changing
- Interval shortening – between proposal & promulgation
- Rapid introduction – of new requirements
- Recordkeeping Burden – Rising
- Training – Lags regulations & requirements
- Crew confusion – Numerous requirements?
- Vessel Design – Limitations
- Compliance costs – Not evaluated accurately?

# PART 1 – VGP SPECIFIC CHALLENGES



or



# VGP – VAST SCOPE

Affects 26 effluent discharge streams  
incidental to normal operation of vessel

Mindset change – Management & Vessel

## Compliance Challenge – Management



- Review existing policies – Aligned with VGP?
- Amend/add procedures & policies where required
- Disseminate VGP requirements
- Plan & Execute Crew Training
- Practical Recordkeeping & Documentation
- Confirm Continued Vessel compliance
- Familiarize new hires




# Compliance Challenge - Management

- Comprehensive Annual Inspections (CAI)
- Consideration – Incorporating CAI & ISM/ISO Audits
- Corrective Action system
- Keeping VGP Records separate?
- Dilemma – Compliance within 3 NM or perennial?
- Dry docking – Practices & Records
- Consider – Retrofitting & design review


# Dry Dock Statement



 **CERTIFIED COPY** Certificate no.   
Page 1 of 1

Statement of Dry-Dock Survey under United States National Pollutant Discharge Elimination System - Vessel General Permit

Office: 

Date: **13 April 2009**

This certificate is issued to 

Ship's Name:   
IMO Number: 

This is to certify that the undersigned Surveyor to Lloyd's Register EMEA did at the request of the Owners attend at Syros / Greece on the 13<sup>th</sup> April 2009 for the purposes of carrying out survey in dry-dock in accordance with the United States National Pollutant Discharge Elimination System - Vessel General Permit and that the following items were inspected / examined during dry-docking to the extent accessible and to the best knowledge of and satisfaction of the undersigned:

1. The chain locker has been cleaned to remove both sediment and living organisms;
2. The vessel's hull, propeller, rudder, sea chest and other underwater surface areas have been inspected for attached living organisms and those organisms have been removed or neutralized;
3. It is confirmed that the vessel has a valid International Anti-Fouling Systems Certificate or Statement of Compliance;
4. All cathodic protection, anodes and / or dielectrics have been cleaned or replaced to reduce flaking;
5. Vessel certificates and records confirm that all pollution control equipment required by MARPOL regulations was examined during the last renewal and annual surveys and the certificates relating to that equipment remain valid at the time of dry-docking;
6. Protective seals for rudder bearing and stern tube have been inspected and replaced as necessary.

This report is issued in good faith at the Owner's request, as documentary evidence with the above requirements.

# Compliance Challenge – Vessel

Not another one!



# Compliance Challenge – Vessel

- Tools & Resources – How to comply ?
- Inability to assimilate large regulations
- Gap – expectation & achievable performance
- Shipboard training – Not formalized & available
- Inspection & Monitoring – Expertise & Knowledge
- CA – Management
- Recordkeeping – Regular & Accurate
- Additional Records – Dry-dock, TBT Free Paint etc.
- External verification – Crew ability

# Biggest VGP Challenge

- Ship board training & familiarization
- Information dissemination
- Being evaluated against Best Management Practices

## Part 2 – VGP Solutions



# VGP – VERY ACHIEVEABLE

- Adaptive – Allows use of existing system
- Based on Quality Systems template
- Simple – Best Management Practices
- Practical – Procedures driven
- Continuous Improvement – Mantra

# Self Governance

- Self Inspection
- Self Monitoring
- Self Reporting

Designed for internal “Command & Control”



# Penalties

- Falsification, tampering, or rendering inaccurate any monitoring device or method
  - Maximum fine of < \$10,000, or imprisonment for < than 2 years, or both.
- Falsification of Record or Document or statement etc., including monitoring reports, NCs
  - Fine of < \$10,000 per violation, or imprisonment < than 6 months per violation, or by both.
- Maximum penalty of \$ 37,500 per violation per day.

# Penalties (NC & CA)

- NC constitutes a violation of the CWA. Each day a violation continues is a separate violation of this permit.
- CA time intervals provided – are not grace periods. But reasonable period for repairs and improvements.
- The problems should not persist indefinitely.
- Return to compliance ASAP, but no later than permitted time period.
- Continuing failure – Violations of CWA.

# Pondering Points

- Shipboard – Environmental Engineer
- Vessel Design
  - Dump valves & Slop tanks for Non tank vessels
  - Deck retention fish plates
  - Sampling cocks
  - Container vessel with larger cargo bilge holding capacity
  - ICCP and Electrical MGR systems for pipelines
  - Use of non-marine pollutant lubricants for mooring wires

# Questions

